

ESTTA Tracking number: **ESTTA424959**

Filing date: **08/12/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200551
Party	Defendant Coachella Music Festival, LLC
Correspondence Address	PETER K. HAHN LUCE, FORWARD, HAMILTON & SCRIPPS, LLP 600 W BROADWAY STE 2600 SAN DIEGO, CA 92101-3372  phahn@luce.com
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Date	08/12/2011
Attachments	Coachella Stylized Answer.pdf ( 4 pages )(286642 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re:

Applicant's Mark: **COACHELLA (Stylized)**  
Serial No.: **85/133,569**  
Filed: September 20, 2010  
Published: In the Official Gazette on March 8, 2011

Coach Services, Inc.,  
a Maryland corporation,

Opposer,

vs.

Coachella Music Festival, LLC,  
a Delaware corporation,

Applicant,

Opposition No. 91200551

**ANSWER TO NOTICE OF  
OPPOSITION**

Applicant Coachella Music Festival, LLC ("Applicant") hereby answers the Notice of Opposition filed by Coach Services, Inc. ("Opposer") as follows, wherein numbered paragraphs correspond to the like numbered paragraphs in the Notice of Opposition.

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of paragraph 1 averments, and therefore denies same.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of paragraph 2 averments, and therefore denies same.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of paragraph 3 averments, and therefore denies same.

**LUCE, FORWARD, HAMILTON & SCRIPPS LLP** 600 WEST BROADWAY, SUITE 2600 SAN DIEGO, CA 92101-3372 TELEPHONE (619) 236-1414 FACSIMILE (619) 232-8311

1 18. Applicant asserts that Opposer's requested relief should be denied because  
2 there is no likelihood of confusion between Registrant's use, if any, and Applicant's use.

3 19. Applicant asserts that Opposer's requested relief should be denied because  
4 Opposer has failed to use the mark COACHELLA in interstate commerce.

5 20. Applicant asserts that Opposer's requested relief should be denied as claims  
6 are barred due to laches and/or acquiescence by Opposer given the unreasonable delay in  
7 asserting its rights.

8 WHEREFORE, Applicant requests that the present opposition be dismissed with  
9 prejudice so that Applicant's application can proceed to mature into a registration.

10 Dated: August 12, 2011

Respectfully submitted,

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12  
13 By: 

PETER K. HAHN  
Attorney for Applicant

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**CERTIFICATE OF SERVICE BY MAILING**

It is hereby certified that on August 12, 2011, a copy of the forgoing ANSWER TO NOTICE OF OPPOSITION was served on the attorneys for the Opposer by First Class Mail, postage prepaid at the following address:

Suzanne White  
Coach Services, Inc.  
516 West 34<sup>th</sup> Street  
New York, NY 10001

  
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Peter K. Hahn

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